

UNITED STATES DISTRICT COURT
IN THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA

v.

MICHAEL A. GONZALEZ

Criminal No.

5:21-CR-76

UNITED STATES' MOTION FOR DETENTION

The United States, by counsel, Jonathan A. Ophardt, Acting United States Attorney for the District of Vermont, and Jeffrey W. Davis, Assistant United States Attorney, moves for detention under 18 U.S.C. §§ 3142(e) and (f).

1. Eligibility of Case

This case is eligible for a detention order because this case involves:

- a. A serious risk that the defendant will flee;
- b. A serious risk that the defendant will obstruct or attempt to obstruct justice; and
- c. A serious risk that the defendant will threaten, injure, or intimidate a prospective witness or juror, or attempt to do so.

2. Reason for Detention

The Court should detain defendant because there are no conditions of release that will reasonably assure the appearance of the person as required and the safety of any other person and the community.

3. Time for Detention Hearing

The United States requests a one-day continuance of the detention hearing.

4. Supplement Grounds

The United States requests leave of Court to supplement this motion with additional grounds or presumptions for detention.

WHEREFORE, the United States moves to detain defendant Michael A. Gonzalez pending trial.

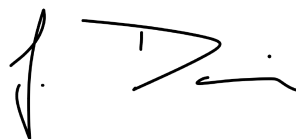
Dated: August 27, 2021.

Respectfully submitted,

UNITED STATES OF AMERICA

JONATHAN A. OPHARDT

Acting United States Attorney

A handwritten signature in black ink, appearing to read 'J. Davis', with a stylized flourish at the end.

JEFFREY W. DAVIS

Assistant United States Attorney

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